



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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January 8, 2025

Via ECF

MEMO ENDORSED

The Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Nampiaparampil v. N.Y.C. Campaign Fin. Bd., et al.
No. 23 CV 6391 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for Defendants in the above-referenced action. I write to respectfully request a 1-week extension of Defendants' deadline to respond to Plaintiff's motion for sanctions, (ECF Nos. 86), and a concomitant 1-week adjournment of the conference scheduled for January 23, 2024.

As the Court is aware, Plaintiff's motion for sanctions was filed at around 9:30 PM on Friday, December 27, 2024. I was out of the office at that time and remained on vacation through to the afternoon of January 2, 2025. On that same day, the Court directed that Defendants respond to Plaintiff's motion by January 9, 2025. (ECF No. 89.) However, due to staff outages at my office and at the New York City Campaign Finance Board during the holiday period, I have only recently been able to begin discussing and developing a response to Plaintiff's motion with my client. The requested 1-week extension would permit additional time to have these discussions and to draft Defendants' opposition. Moreover, because of the nature of Plaintiff's motion, any response to it is subject to additional review by coordinate divisions and units within my office. The requested extension will afford those units the time to do so.

I separately and respectfully request that the Court adjourn the conference currently scheduled for January 16, 2025, at 3:30 PM by one week. This request is made on the

understanding that the Court would appreciate sufficient time to review the parties' submissions in advance of the conference, and so if the Court is amenable to granting an extension of the Defendants' deadline to oppose Plaintiff's motion by one week, then I respectfully propose an adjournment of the conference to the following week so that the Court has such time. I am available on January 23, 2025, at 3:30 PM but am happy to coordinate with the Court's deputy as to an alternative time as the Court may direct.

This is Defendants' first request for an extension of their time to respond to Plaintiff's motion for sanctions, and it is Defendants' first request for an adjournment of the January 16, 2024 conference. The requested extension would move Defendants' deadline to respond to January 16, 2025, and the requested adjournment would move the conference to January 23, 2025.

I sought Plaintiff's consent to this application yesterday afternoon and later indicated that I intended to file it this morning in light of the Court's closure on Thursday for the Day of Mourning. In her response to me, Plaintiff stated, "I do not consent to the extension. I need more time to write up my reasons, and will formally oppose if you file for an extension. I just wanted to get back to you before you filed."

I thank the Court for its consideration of this matter.

Respectfully yours,

The Court is in receipt of the Parties' letter motions, Docs. 90, 91. City's request for a one week extension to respond to Nampiaparampil's motion for sanctions, from January 9, 2025, to January 16, 2025, is GRANTED. The conference, currently scheduled for January 16, 2025, is adjourned until Wednesday, January 22, 2025 at 2:30 PM in Courtroom 619 at the Thurgood Marshall United States Courthouse.

/s/ *David S. Thayer*

David S. Thayer

It is SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 1/08/2025
New York, New York